

EXHIBIT A

Glossary of Acronyms in Plaintiffs' Summary Judgment Brief***Chan, et al. v. Department of Transportation, et al.***
Case No. 23-cv-10365-LJL

Acronym	Meaning	Explanation
AADT	Annual Average Daily Traffic	A measure of the average number of vehicles that travel through a specific point of the road over the course of a year.
APA	Administrative Procedure Act	5 U.S.C. §§ 701–706.
CAA	Clean Air Act	42 U.S.C. §§ 7401 <i>et seq.</i>
CBD	Central Business District	The Manhattan Central Business District consists of the geographic area of Manhattan south of and inclusive of 60 th Street, not including the Franklin D. Roosevelt Drive and the West Side Highway/Route 9A, the Battery Park Underpass and any surface roadway portion of the Hugh L. Carey Tunnel that connects to West Street. ECF 7-1 at ES-2.
CEQ	Council on Environmental Quality	A federal agency created by the National Environmental Policy Act (“NEPA”) that publishes guidelines and regulations on the applicability of NEPA to federal agency action.
EA	Environmental Assessment	<p>The National Environmental Policy Act requires a federal agency to prepare an Environmental Assessment (“EA”) for proposed actions to determine whether or not the action would “significantly affect[] the quality of the human environment.” <i>See</i> 42 U.S.C. § 4332(2)(C).</p> <p>An EA should discuss the purpose and need for the proposed action, address the environmental impacts of the proposed actions and potential alternatives, and provide “evidence and analysis for determining whether to prepare an environmental impact statement or finding of no significant impact.” <i>See</i> 40 C.F.R. § 1501.5.</p>
EIS	Environmental Impact Statement	<p>Federal agencies must prepare an EIS for federal actions that “significantly affect[] the quality of the human environment.” <i>See</i> 40 C.F.R. § 1502.3.</p> <p>An EIS details the process through which a project was developed, includes consideration of a range of reasonable alternatives, analyzes the potential impacts resulting from the alternatives, and</p>

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		demonstrates compliance with other applicable environmental laws and executive orders. 40 C.F.R. § 1502.
EPA	Environmental Protection Agency	A federal agency responsible for the protection of human health and the natural environment.
FHWA	Federal Highway Administration	An agency of the United States Department of Transportation that supports State and local governments in the design, construction, and maintenance of the Nation’s highway system with the goal of improving mobility.
FONSI	Finding of No Significant Impact	A federal agency may prepare a “finding of no significant impact” (“FONSI”) after preparing an EA only “if the agency determines . . . the proposed action will not have significant effects.” 40 C.F.R. § 1501.6. Otherwise, the agency must prepare an EIS.
GHG	Greenhouse Gas	Gas that traps heat in the atmosphere.
MSAT	Mobile Source Air Toxics	Nine compounds identified by the EPA as substantial contributors to air pollution and associated with vehicular traffic that are hazardous to human health. <i>See</i> ECF 7-5 at 10-5 and ECF 7-6 at 17-29.
MTA	Metropolitan Transportation Authority	A public benefit corporation responsible for public transportation in the New York City metropolitan area.
NAAQS	National Ambient Air Quality Standards	The Clean Air Act requires the EPA to set NAAQS for six major air pollutants, known as criteria pollutants: CO, NO ₂ , O ₃ , PM _{2.5} and PM ₁₀ , sulfur dioxide (SO ₂), and lead (Pb). ECF 7-6 at 17-29. The standards define the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air with an adequate margin of safety, to protect the public health. 40 C.F.R. § 50.2
NEPA	National Environmental Protection Act	The National Environmental Protection Act requires that Federal agencies assess the environmental effects of their proposed actions before making decisions. 40 C.F.R. § 1500.1.
PM	Particulate matter	Microscopic particles of solid or liquid matter found in the air.
PM _{2.5}	Particulate Matter 2.5 Microns	Particulate matter smaller than or equal to 2.5 microns. PM _{2.5} particles “are so tiny that they can penetrate deep[] into the lungs and damage lung tissues,” causing a multitude of health problems. ECF 7-7 at 17D-7; DOT_0000405at DOT_0001125.

Acronym	Meaning	Explanation
SIP	State Implementation Plan	For areas not meeting federal air quality standards, a plan used by a state, territory, or local air district to implement, maintain, and enforce the National Ambient Air Quality standards and to fulfill other requirements of the Clean Air Act.
TBTA	Triborough Bridge and Tunnel Authority	An affiliate of the MTA that operates seven bridges and two tunnels in New York City. ECF 7-1 at ES-2; <i>MTA Bridges and Tunnels</i> , https://new.mta.info/agency/bridges-and-tunnels .
TMA	MTA Reform and Traffic Mobility Act	An act adopted by the New York State Legislature in April 2019 to reduce traffic congestion within the Manhattan CBD by establishing the CBD tolling program. N.Y. Veh. & Traf. Law §§ 1701–1706.
TMRB	Traffic Mobility Review Board	The TMRB required the TBTA to establish a Traffic Mobility Review Board with six members representing the region who have experience in public finance, transportation, mass transit, or management. The TMRB is tasked with recommending to the TBTA the toll amounts and structure.
VMT	Vehicle miles traveled	A measure of the total amount of miles traveled for all vehicles in a geographic region over a given period of time, typically a one-year period.
VPPP	Value Pricing Pilot Program	A program established by the federal government to demonstrate whether and to what extent roadway congestion may be reduced through congestion pricing strategies, and the impact of such strategies on driver behavior, traffic volumes, transit ridership, air quality and availability of funds for transportation programs. <i>See Value Pricing Pilot Program</i> , https://ops.fhwa.dot.gov/congestionpricing/value_pricing/ .